

# **Exhibit 2**

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June 3, 2022

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Re: Suez Rajan: June 2, 2022 Meet-and-Confer

Dear Brian,

Thank you for conferring yesterday regarding the Hoglan Creditors' extant discovery requests and Respondents' responses and objections. We appreciated the opportunity to discuss the clarification and prioritization of the outstanding discovery. In particular, while reserving our clients' rights with respect to all pending discovery requests, we look forward to hearing your clients' positions with respect to the following issues we discussed:

- Whether Respondents would produce communications in response to Document Request 2 if the time period is limited to January 22, 2022 through the present.
- Whether Respondents would produce communications in response to Document Request 4 if the word "disposition" is clarified to mean "sale, transfer, redelivery, or repossession."
- Whether Respondents are willing to update their responses to Information Subpoena questions 6, 8, and 9 to account for any new information they may have learned in the time since completing the previous responses.
- Whether Respondents would update their responses to Information Subpoena question 12 in the event the word "disposition" were clarified, as above, to mean "sale, transfer, redelivery, or repossession."

We also look forward to learning your position with respect to a deposition of Mr. Graham to cover, at a minimum, issues relating to personal jurisdiction in light of the apparent inconsistencies between his declaration and the public record, as we discussed.

We look forward to your response prior to June 13 as you proposed.

Sincerely,  
Lee Wolosky